IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Ronald G. Linaburg, : Bankruptcy No.: 20-22898-CMB

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Debtor. : Chapter 11

DEBTOR'S STATUS REPORT IN ACCORDANCE WITH ORDER AT DOCKET 444

AND NOW comes the Debtor, by and through his Counsel, Brian C. Thompson, Esquire, Thompson Law Group, P.C., and hereby provides the following Status Report in Accordance with the Order at Docket 444 averring as follows:

- 1. On December 16, 2021, and several other days last week, Debtor's Counsel and Counsel for Diana Marie Dongell, D.M.D., Attorneys Hicks and McGee, conducted a meet and confer via electronic and written communications. Counsel for Associated Dental Specialists ("ADS"), Attorneys Kaplan and Meyers, were involved in those various communications, as well. The parties are currently attempting to schedule a meet and confer on December 22 or December 23 this week to continue a discussion regarding discovery disputes and
- 2. Counsel for Ronald E. Hand, D.M.D., Renee R. Kalp, D.M.D., and Rebecca L. Watkins, D.M.D. did not participate in last week's meet and confer communications as the result of an agreement in principle reached between the non-party entity ADS and those three parties that would also resolve the outstanding disputes between those parties in this Case and render them moot. The parties have signed a release agreement, which is subject to Court approval, and Debtor's Counsel has provided Attorneys Shiner and Thomas with a draft motion to approve the release agreement for review but has not yet hear back from them as to their satisfaction for filing. Debtor hopes to have the motion filed quickly once a response is received.

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3. On December 16, 2021, the parties also continued to discuss discovery requests and objections thereto. Without waiver of objections, ADS Counsel has offered continued discussions with Dongell's Counsel regarding any additional information that can be provided without waiver of objections. Additionally, without waiver objections, Debtor also provided additional documentation informally to Dongell's Counsel on December 16, 2021 and plans to provide some remaining documents informally and voluntarily, as soon as possible. It is Debtor's Counsel's position that soon, without waiver of objections, all documents believed to be relevant to an informal production will have been provided to Dongell's Counsel for further discussion.

4. On December 14, 2021, Debtor visited the UPMC Department of Neorology-Ophthalmology at UPMC Eye Center with Dr. Kocasarac for a follow-up post-operation appointment. Debtor's Counsel has been informed that Debtor received a medical opinion that he has been advised to not undergo a deposition for four months. Debtor's Counsel has requested a written opinion to be certain what medical advice was provided. Debtor also has an appointment with Dr. Cibik on December 29, 2021.

Respectfully submitted,

Date: <u>December 21, 2021</u> By: <u>/s/ Brian C. Thompson</u>, Esquire

Brian C. Thompson

Pa. I.D. 91197

Thompson Law Group, P.C.

125 Warrendale Bayne Road, Suite 200

Warrendale, PA 15086 (724) 799-8404 Telephone (724) 799-8409 Facsimile

bthompson@thompsonattorney.com